BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE DOMMINION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

FOURTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS TAKIS (UPS/USPS-T41-25)

(September 16, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Takis (UPS/USPS-T41-25).

Respectfully submitted,

Abhn E. McKeever Albert P. Parker, II Stephanie Richman

Attorneys for United Parcel Service

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Of Counsel.

FOURTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS TAKIS

UPS/USPS-T41-25. In reference to Exhibit USPS-41B, and your

derivation of incremental costs for Parcel Post, please describe how your analysis

treats OBMC, DBMC, and DSCF mail as distinct from other Parcels Zone Rate mail.

Your description should include an explanation of how, and to what extent, costs

associated with returning trucks or empty equipment to the origination point for these

subclasses are taken into account in your analysis and workpapers.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

Albert P. Parker, II

Dated: September 16, 1997

Philadelphia, PA

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